

**UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND**

**Federal Trade Commission**

**Plaintiff,**

**v.**

**Innovative Marketing, Inc., *et al.***

**Defendants,**

**AND**

**Maurice D'Souza**

**Relief Defendant.**

**CIVIL NO. RDB 08-CV-3233**

**JOINT MOTION TO REVISE SCHEDULING ORDER AND RESUME LITIGATION**

Plaintiff, the Federal Trade Commission (“FTC” or “Commission”), and Defendants Marc D’Souza, Maurice D’Souza, and Kristy Ross hereby request that this Court enter the attached scheduling order, which will lift the stay entered in this case and allow the parties to resume litigation. In support of their motion, the parties state as follows:

1. On May 27, 2010, this Court stayed this matter so that the FTC and Marc and Maurice D’Souza could pursue a settlement in principle reached between them. The Court extended the stay on July 21, 2010.
2. After several months of fruitful discussions, the D’Souzas have announced that they are unable or unwilling to meet their obligations under the terms of the settlement in principle.
3. With no settlement imminent, the parties agree that litigation should resume.
4. Due to the lengthy stay of proceedings, the parties request that the Court enter the attached scheduling order, which will clarify the new deadlines in this case.

**WHEREFORE**, the FTC, Marc D'Souza, Maurice D'Souza, and Kristy Ross, respectfully request the Court enter the attached scheduling order.

Dated: September 22, 2010

Respectfully submitted:

/s/ Ethan Arenson

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[PROPOSED] **ORDER REVISING SCHEDULING ORDER**

Upon consideration of the Joint Motion to Revise Scheduling Order and Resume Litigation submitted by the parties to this case and for good cause shown, it is this \_\_\_\_\_ of September, 2010, **HEREBY ORDERED** that the deadlines in the Scheduling Order shall be modified as follows:

Discovery deadline	October 5, 2010
Requests for admission	October 22, 2010
Dispositive pretrial motions deadline	November 4, 2010

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Richard D. Bennett  
United States District Judge

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 22, 2010, I caused a true and correct copy of the foregoing Joint Motion to Revise Scheduling Order and Resume Litigation to be served via the Court's electronic filing system upon:

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